

1 STEVEN KALAR
Federal Public Defender
2 JOYCE LEAVITT
Assistant Federal Public Defender
3 555 12th Street, Suite 650
Oakland, CA 94607-3627
4 (510) 637-3500
5 Counsel for Defendant ROBERT DOYLE

FILED

SEP 17 2014

RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

6 IN THE UNITED STATES DISTRICT COURT
7
8 FOR THE NORTHERN DISTRICT OF CALIFORNIA

9 UNITED STATES OF AMERICA,)

10 Plaintiff,)

11 v.)

12)
13 ROBERT THOMAS DOYLE,)

14 Defendant.)
15

No. CR 14 - 0092 JST

STIPULATION AND [PROPOSED]
ORDER CONTINUING CHANGE OF
PLEA DATE; EXCLUSION OF TIME

16 **STIPULATION**

17 IT IS HEREBY STIPULATED, by and between the parties to this action, that the change of
18 plea date for defendant Robert Doyle, currently scheduled for September 19, 2014, at 9:30 a.m., may
19 be continued one week to September 26, 2014, at 9:30 a.m. for change of plea. The case will resolve
20 by change of plea but defense counsel needs a brief continuance to meet with Mr. Doyle, respond to
21 his questions and finalize the terms of the plea agreement prior to the change of plea date.
22

23 IT IS FURTHER STIPULATED THAT the time to September 26, 2014, should be excluded in
24 accordance with the Speedy Trial Act, 18 U.S.C. §§ 3161(h)(1)(A) and (h)(7)(B)(iv) for effective
25 preparation taking into consideration due diligence to enable counsel to meet with Mr. Doyle,
26 respond to his questions and finalize the plea agreement prior to the change of plea.

U S v. Doyle CR 14-0092 JST; Stip re:
Change of plea date; Exclusion of Time

1 DATED: 9/16/14

/s/
JOYCE LEAVITT
Assistant Federal Public Defender

3 DATED: 9/16/14

/s/
THOMAS MOORE
Assistant United States Attorney

6 I hereby attest that I have permission of the parties to enter a conformed signature (/s/) for all
signatures within this e-filed document.

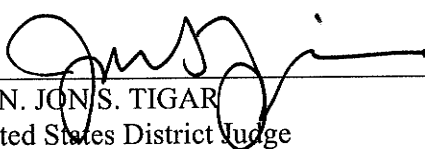
8 **ORDER**

9 GOOD CAUSE APPEARING, IT IS HEREBY ORDERED that the change of plea date for
10 defendant Robert Doyle, currently scheduled for September 19, 2014, at 9:30 a.m., may be continued
11 one week to September 26, 2014, at 9:30 a.m. for change of plea.

12 IT IS FURTHER ORDERED THAT the time from September 19, 2014, to September 26,
13 2014, should be excluded in accordance with the provisions of the Speedy Trial Act, 18 U.S.C. §§
14 3161(h)(1)(A) and (h)(7)(B)(iv) for effective preparation of counsel taking into consideration due
15 diligence to enable defense counsel to meet with Mr. Doyle, respond to all of his questions and
16 finalize the terms of the plea agreement prior to the change of plea date. The Court finds there is
17 good cause and the ends of justice served by the granting of the continuance outweigh the interests of
18 the public and defendant in a speedy and public trial. Failure to grant the requested continuance
19 would unreasonably deny counsel reasonable time necessary for effective preparation, taking into
20 account due diligence.

23 SO ORDERED.

24 DATED: 9/17/14


HON. JON S. TIGAR
United States District Judge